

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
FOR A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Stefan Hinds, being first duly sworn, hereby depose and state as follows:

1. I have been a Postal Inspector with the U.S. Postal Inspection Service (USPIS) since February 2020 and am currently assigned to the Washington Division, Richmond, Virginia, Domicile. As a Postal Inspector, I am charged with investigating crimes with a nexus to the U.S. Postal Service ("USPS") or U.S. mail, including but not limited to mail theft, mail fraud, financial fraud, identity theft, robberies and burglaries of postal facilities, assaults and threats on postal employees, investigations of dangerous and prohibited mails, narcotics, and cybercrime. Since January 2023, I have also served as a Special Deputy United States Marshal with the United States Marshals Service assigned to the Capital Area Regional Fugitive Task Force (CARFTF) Richmond. Prior to my tenure with the USPIS, I was a Special Agent with the U.S. Department of Treasury Inspector General for Tax Administration for more than two years and served in the Cyber Investigative Cadre there. In connection with these roles, I completed in excess of 400 hours of instruction at the Federal Law Enforcement Training Center in Glynco, Georgia and graduated the Criminal Investigator Training Program and the Special Agent Basic Training, which included training in arrest procedures, applying for and executing search and seizure warrants, and various other criminal laws and procedures. I have also received specialized training from the Federal Bureau of Investigation's Cellular Analysis Survey Team in historical cell site analysis and geospatial mapping and from the National Cyber-Forensics & Training Alliance.

2. In connection with these roles, I have either led or been involved in a wide range of cybercrime, identity theft, and fraud investigations into individual targets and their co-conspirators using computers, other electronic devices, and the Internet unlawfully to access or use other computers or devices and to defraud individual victims and institutions, including banks and the U.S. Government, including via public benefits fraud. Through this training and experience, I have become very familiar with the various methods and means these criminals and their co-conspirators use to execute their often complex and sophisticated schemes, including, for instance, using social media to enable bank fraud "card cracking" schemes. Given the broad scope of my areas of responsibilities with the USPIS and my involvement in CARFTF, I have also conducted and participated in investigations related to drug trafficking, firearms, money laundering, and violent crime, including the theft of money and property (belonging both to individuals and the Government) by fraud or force, as well as armed and unarmed assault of government employees. In connection with these duties and investigations, I have sought and executed numerous search and seizure and arrest warrants, including for physical premises, for individuals, for computers and other electronic devices, and for information associated with online accounts and records. I have also engaged in a wide range of other investigative activities, including physical surveillance; debriefing defendants, witnesses, informants, and other individuals with knowledge of the particular criminal scheme; undercover operations; consensual monitoring and recording of conversations; electronic surveillance through the use of pen registers and trap and trace devices; and the handling and maintenance of evidence. Finally, I have testified before federal grand juries and in court in the Eastern District of Virginia.

3. The facts in this Affidavit come from my observations, knowledge, training, and experience, and from information that I have learned, directly or indirectly, from witnesses, records, information from other law enforcement officers, and from my review of documents and other media. Unless otherwise indicated, conversations related herein are described in substance and part rather than verbatim. Likewise, I have not included each and every fact known to me but rather only those necessary to show probable cause to believe that OLDEN ELLERBE III has committed violations of 18 U.S.C. § 1349 (Conspiracy to Commit Bank Fraud) and 18 U.S.C. § 1708 (Possession of Stolen Mail).

**PROBABLE CAUSE IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

4. In 2022 and 2023, the United States Postal Service (USPS) hardened the collection box inventory across the country against traditional fishing-related mail theft. In response, there has been an increased demand for postal Arrow keys, which open all of the collection boxes in a geographic area. These keys are sold for thousands of dollars on the black market, as criminals seek to acquire them to facilitate the theft of U.S. Mail in connection with other lucrative criminal schemes, like card cracking, check fraud, and identity theft. Because of their wide-ranging access and related value, the possession, use, and transfer of Arrow keys is highly regulated, leading criminals to steal them from postal workers through actual or threatened violence, to recruit postal employee co-conspirators from whom to lease their Arrow keys, and to purchase them illicitly in criminal marketplaces, e.g., via the Dark Web.

5. Since August 2023, the USPIS has been investigating multiple break-ins into the blue collection boxes at the Richmond Main Post Office located at 1801 Brook Road, Richmond, VA 23232 located within the Eastern District of Virginia. USPS blue collection boxes often contain an assortment of checks, cash, money orders, and other personally identifiable information. Criminals seek to acquire them to facilitate the theft of U.S. Mail in connection with other lucrative criminal schemes, like card cracking, check fraud, and identity theft.

6. On or about November 15, 2023, your affiant, and Richmond Police Department (RPD) responded to the area of 3200 West Broad Street, Richmond, Virginia (VA) in reference to a Richmond Police Department (RPD) 911 call for service from a Virginia Credit Union (VACU) manager. The VACU manager reported that two subjects were withdrawing thousands of dollars from an exterior Interactive Teller Machine (ITM) at VACU's Scott's Addition location. Subject #1 wore a black jacket, black pants, black shoes, a black surgical mask, and what appeared to be a black skull cap. Subject #2 wore a black Nike bubble jacket, tan colored pants, white pants, a black surgical mask, and had a black backpack slung across the shoulder. Upon arrival on scene, your affiant and an RPD detective discovered that ELLERBE was in custody and in his possession was a black and white backpack, a large sum of cash both on the ground and in the backpack, and a black Glock 21 bearing the serial number YSA872 on his person. The investigative team learned that the second subject escaped law enforcement on foot.

7. Law enforcement conducted an inventory of the backpack and discovered the following items: 83 checks, \$59,940 in cash, 9 credit/debit cards, and 5 United States Savings Bonds. Law enforcement also confirmed that ELLERBE had utilized the Social Security number

of and several bank account numbers belonging to Victim 1—without Victim 1’s knowledge or consent—to withdraw at least \$85,000 in United States currency from Victim 1’s bank accounts via ITM transactions conducted at three different VACU locations in Richmond.

8. Your affiant later interviewed Victim 2 in reference to a check located inside the backpack that ELLERBE had at the time he was arrested. Victim 2 stated that on November 2, 2023, she placed the check in the blue collection boxes located at the Richmond Main Post Office. Victim 2 advised that the check was made payable to Saunders Roofing in the amount of \$2,431.00 and that the company never received the check. Furthermore, Victim 2 advised your affiant that she did not authorize anyone to have possession of her check or bank account information.

9. At a later date, and based on information provided by a citizen and the VACU, law enforcement located a 2023 Dodge Durango bearing the Florida (FL) license plate LHQ-E99 in the 3100 block of W. Marshall Street, Richmond, VA. According to the Virginia Department of Motor Vehicles (DMV) records the vehicle is registered to Hertz Vehicles LLC. The investigative team learned from a Hertz representative that the vehicle was rented by ELLERBE. The vehicle was towed to RPD’s impound lot to Seibert’s Towing in anticipation of obtaining a search warrant.


10. On or about November 22, 2023, RPD obtained a search warrant for the 2023 Black Dodge Durango. On the same day, your affiant assisted RPD in the execution of the search warrant. Located in the vehicle were several items significant to the investigation, to include a VACU debit card bearing the name of Victim 3, and a Washington D.C. driver’s license bearing the name of Victim 3 but with ELLERBE’s face.

11. Your affiant located the Richmond City Sheriff’s Office booking photo of ELLERBE dated November 15, 2023, and compared it to the photo located on the Washington D.C. driver’s license, and determined it to be the same individual, ELLERBE.

12. Your affiant interviewed Victim 3 in regards to the Washington D.C. driver’s license bearing Victim 3’s name located inside the 2023 Dodge Durango rented by ELLERBE. Victim 3 advised that he has never had a bank account with VACU nor lived in the state of Virginia.

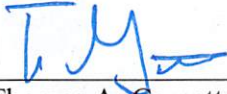
CONCLUSION

13. Based on the information contained herein, I respectfully submit that probable cause exists to charge OLDEN ELLERBE III with committing violations of 18 U.S.C. § 1349 (Conspiracy to Commit Bank Fraud) and 18 U.S.C. § 1708 (Possession of Stolen Mail).



Postal Inspector Stefan Hinds
United States Postal Inspection Service

This affidavit has been reviewed for legal sufficiency by Assistant U.S. Attorney Thomas A. Garnett.

Reviewed: 

Thomas A. Garnett
Assistant United States Attorney

Subscribed and sworn before me on February 1, 2024, in the City of Richmond, Virginia.



Hon. Summer L. Speight
UNITED STATES MAGISTRATE JUDGE